## REMARKS

The Office Action mailed April 18, 2007, has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 6 and 8-20 are now pending in this application. Claims 6-20 stand rejected. Claims 12 and 18 stand objected to. Claim 7 has been canceled. Claims 1-5 have been canceled without prejudice.

The present amendment is intended to place the application in condition for allowance by canceling non-elected Claims 1-5. Applicants wish to emphasize that the cancellation of Claims 1-5 is without prejudice, and that Applicants reserve the right to file a divisional application or applications to prosecute the subject matter of these claims.

The objection to Claims 12 and 18 due to an informality is respectfully traversed. Specifically, Applicants have amended Claims 12 and 18 to replace "are" with "is" in line 2 of each Claim as requested by the Examiner. For at least the reasons set forth above, Applicants respectfully request the objections to Claims 12 and 18 be withdrawn.

The rejection of Claims 6-12 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,830,240 to Jones, et al. (hereinafter referred to as "Jones") is respectfully traversed.

Jones describes an apparatus for securing a component for manufacture. The apparatus includes a first clamping member (58) that includes a biasing mechanism (62) and a second clamping member (60) that are each fixedly coupled to a fixture (52). Biasing mechanism (62) is configured to align a component between the first and second clamping members (58 and 60), such that the component is secured therebetween. As such, the component can be manufactured, repaired, modified, and/or inspected without shifting or movement that may result in inaccurate manufacturing, repairing, modification, and/or inspection.

Notably, Jones does not describe nor suggest an apparatus that includes a first set of retainers that slidably couple to a body portion. Rather, Jones describes clamping members that are coupled to a fixture using threaded bolts with either threaded nuts or threaded holes and/or by rotatably coupling the clamping members to a fixture. As such, the clamping members described in Jones are not capable of slidably coupling to a body portion. Further, Jones does not describe nor suggest a first set of retainers that can be replaced by a second set of retainers that are configured to retain a second component that is different than the component retained by the first set of retainers. Rather, Jones describes a single set of fixedly coupled clamping members.

Moreover, Jones does not describe nor suggest a locking mechanism that includes a first end, a second end opposite the first end, a central portion that couples the first end to the second end, and a handle coupled to the second end. Rather, Jones describes fixedly coupling first and second clamping members to a dovetail clamp assembly using threaded bolts and threaded nuts or, in an alternative embodiment, threaded bolts and threaded holes in dovetail clamp assembly.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. The mere assertion that "it would have been obvious to one of ordinary skill in the art at the time the invention was made that removably coupling the first set of retainers to the body portion by slidably coupling the retainers to the body portion versus using threaded bolts as taught by Jones et al. is an obvious matter of design choice as long as the retainers can be removed from the body portion for repair or substitution of the retainers" does not support a prima facie obvious rejection. Nor does the assertion that "it is within the general knowledge of one of ordinary skill in the art to appropriately removably couple retainers to a body portion" support a prima facie obvious rejection. Rather, each allegation of what would have been an obvious matter of design choice must always be supported by citation to some reference work recognized as standard in the pertinent art, and Applicants given an opportunity to challenge the correctness of the assertion or the repute of the cited reference. Applicants have not been provided with the citation to any reference supporting the combination made in the rejection. The rejection, therefore, fails to provide

Applicants with a fair opportunity to respond to the rejection, and fails to provide Applicants with the opportunity to challenge the correctness of the rejection. Therefore, Applicants respectfully request that the Section 103 rejection be withdrawn.

Moreover, if art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. Moreover, Applicants respectfully submit Jones teaches away from the claimed invention. Specifically, Jones teaches away from a first set of retainers that *slidably* couple to a body portion. Rather, Jones describes clamping members that are *fixedly* coupled to a fixture using threaded bolts with either threaded nuts or threaded holes and/or by *rotatably* coupling the clamping members to a fixture. As such, the clamping members described in Jones are not capable of *slidably* coupling to a body portion. Further, Jones does not describe nor suggest a first set of retainers that can be replaced by a second set of retainers that are configured to retain a second component that is different than the component retained by the first set of retainers. Rather, Jones describes a single set of fixedly coupled clamping members.

Moreover, and to the extent understood, Jones does not describe nor suggest the claimed invention. Specifically, Claim 6 recites an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, wherein the assembly comprises "a base portion; a body portion . . . a first set of retainers removably coupled to said body portion, said first set of retainers comprising an upper portion . . . and a lower portion . . . wherein said first set of retainers slidably couple to said body portion, such that said first set of retainers can be replaced by a second set of retainers that are configured to retain a second dovetail that is different from the first dovetail; and a locking mechanism comprising a first end, a second end opposite said first end, a central portion that couples said first end to said second end, and a handle coupled to said second end, said locking mechanism configured to secure said lower portion within said body portion."

Jones does not describe nor suggest an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, as is recited in Claim 6. More specifically Jones does not describe nor suggest an assembly that includes a first set of retainers that slidably couple to a body portion, such that the first set of retainers can be replaced by a second set of retainers that are configured to retain a second component that is different from a first component that is retained by the first set of retainers, as is required by Applicants' claimed invention. Rather, in contrast to the present invention, Jones describes clamping members that are *fixedly* coupled to a fixture using threaded bolts with either threaded nuts or threaded holes and/or by *rotatably* coupling the clamping members to a fixture. As such, the clamping members described in Jones are not capable of *slidably* coupling to a body portion. Moreover, Jones does not describe nor suggest replacing the clamping members to machine a second component.

Further, Jones does not describe nor suggest an assembly that includes a locking mechanism including a first end, a second end opposite the first end, a central portion that couples the first and second ends, and a handle coupled to the second end, wherein the locking mechanism is configured to secure the lower portion within the body portion, as is required by Applicants' claimed invention. Rather, in contrast to the present invention, Jones describes securing fixedly coupling the clamping members to a fixture using threaded bolts with threaded nuts or threaded holes.

Accordingly, for at least the reasons set forth above, Claim 6 is submitted to be patentable over Jones.

Claim 7 has been canceled. Claims 8-12 depend from independent Claim 6. When the recitations of Claims 8-12 are considered in combination with the recitation of Claim 6, Applicants submit that dependent Claims 8-12 likewise are patentable over Jones.

The rejection of Claims 13-20 under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Applicants' Admitted Prior Art (AAPA) is respectfully traversed.

Jones is described above. AAPA merely describes a method of fabricating a seal wire groove in which individual components are permanently coupled to a machining assembly, to enable a groove to be machined in a specific set of compressor blades. In order to machine seal wire grooves into the compressor blades for each section of a compressor rotor, the machining assembly must removed from the milling machine and the individual components must be unbolted. Then alternate components are bolted onto the milling machine and the machining assembly re-installed.

Notably, AAPA does not describe nor suggest an apparatus that includes a first set of retainers that slidably couple to a body portion. Further, AAPA does not describe nor suggest a first set of retainers that slidably couple to a body portion such that they can be replaced by a second set of retainers that are configured to retain a second component that is different than the component retained by the first set of retainers. Moreover, AAPA does not describe nor suggest a locking mechanism that includes a first end, a second end opposite the first end, a central portion that couples the first end to the second end, and a handle coupled to the second end.

Claim 13 recites a milling machine that includes an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, wherein the assembly comprises "a base portion; a body portion . . . a first set of retainers removably coupled to said body portion, said first set of retainers comprising an upper portion . . . and a lower portion . . . wherein said first set of retainers slidably couple to said body portion, such that said first set of retainers can be replaced by a second set of retainers that are configured to retain a second dovetail that is different from the first dovetail; a locking mechanism comprising a first end, a second end opposite said first end, a central portion that couples said first end to said second end, and a handle coupled to said second end, said locking mechanism configured to secure said lower portion within said body portion; and a grinding wheel configured to machine at least one seal wire groove into said dovetail."

Neither Jones nor AAPA, considered alone or in combination, describes or suggests a milling machine, as is recited in Claim 13. More specifically, neither Jones nor AAPA, considered alone or in combination, describes or suggests an assembly that includes a first set

of retainers that slidably couple to a body portion, such that the first set of retainers can be replaced by a second set of retainers that are configured to retain a second component that is different from a first component that is retained by the first set of retainers, as is required by Applicants' claimed invention. Rather, in contrast to the present invention, Jones describes clamping members that are fixedly coupled to a fixture using threaded bolts with either threaded nuts or threaded holes and/or by rotatably coupling the clamping members to a fixture. As such, the clamping members described in Jones are not capable of slidably coupling to a body portion. Moreover, Jones does not describe nor suggest replacing the clamping members to machine a second component. AAPA describes a method of fabricating a seal wire groove in which individual components are permanently coupled to a machining assembly, to enable a groove to be machined in a specific set of compressor blades.

Further, neither Jones nor AAPA, considered alone or in combination, describes or suggests an assembly that includes a locking mechanism including a first end, a second end opposite the first end, a central portion that couples the first and second ends, and a handle coupled to the second end, wherein the locking mechanism is configured to secure the lower portion within the body portion, as is required by Applicants' claimed invention. Rather, in contrast to the present invention, Jones describes fixedly coupling the clamping members to a fixture, and AAPA describes a method of fabricating a seal wire groove in which individual components are permanently coupled to a machining assembly, to enable a groove to be machined in a specific set of compressor blades.

Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Jones in view of AAPA.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitation of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Jones in view of AAPA.

In addition, Applicants respectfully submit that the Section 103 rejection of Claims 13-20 is not a proper rejection. Obviousness cannot be established by merely suggesting that

"it would have been obvious to one of ordinary skill in the art to incorporate a grinding wheel configured to machine a seal wire groove into a dovetail, in light of the teachings of AAPA." As explained by the Federal Circuit, "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicant." In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000); MPEP § 2143.01.

Furthermore, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the desirability of doing so. *See* In re Gordon, 221 USPQ2d 1125 (Fed. Cir. 1984). Furthermore, the Federal Circuit has determined that:

> [i]t is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.

In re Fritch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992). Further, under Section 103, "it is impermissible . . . to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art." In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, some suggestion, either explicitly or implicitly, to combine such references and a reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure. Alza Corp. v Mylan Labs., Inc., 464 F.3d 1286, 1291 (Fed. Cir. 2006); In re Vaeck, 20 USPQ2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown, either explicitly or implicitly.

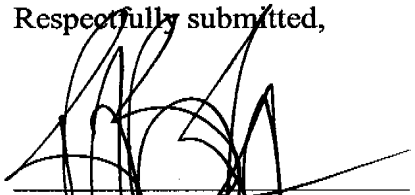
Specifically, there is no suggestion or motivation explicitly or implicitly within Jones and/or AAPA to combine Jones and AAPA to produce the claimed invention. Accordingly, since there is neither a teaching nor a suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of

course, such a combination is impermissible, and for this reason alone, Applicants respectfully request that the Section 103 rejection of Claims 13-20 be withdrawn.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 6 and 8-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,



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